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**nited States Bankruptcy Court**  
**Eastern District of Pennsylvania**

In re Repine K Repine

Debtor(s)

Case No. 22-10631  
Chapter 13

**DEBTOR'S MOTION TO IMPOSE THE AUTOMATIC STAY**

The debtor, Repine K Repine ("Debtor"), through his attorney, Michael T. Malarick, Esq, requests that the Court enter an order imposing the automatic stay under 11 U.S.C. § 362(a) as to all creditors pursuant to 11 U.S.C. §362(c)(4)(B). In support of his request, Debtor states as follows:

1. Debtor filed a petition under Chapter 13 on March 15, 2022.
2. Debtor previously filed a Chapter 13 case on September 15, 2021, and the case was assigned case number 21-12538. The case was dismissed on February 11, 2022, because debtor was unable to make Plan payments due to undergoing brain surgery in Pittsburgh, PA.
3. Debtor filed another Chapter 13 case on October 2, 2018, and that case was assigned case number 18-16578. That case was dismissed on March 7, 2022, because debtor was unable to make Plan payments.
4. The petition in this case has been filed in good faith as to all creditors. The debtor has recovered her health, is currently employed, and intends to make weekly Plan payments.
5. Debtor believes that the Chapter 13 plan she has submitted in this case will be confirmed and that she will be able to fully perform under the terms of the plan.
6. There were no motions for relief from the automatic stay, objections to confirmation, or other pleadings filed against Debtor by any of his creditors in either of her previously dismissed cases.

WHEREFORE, Debtor requests that this Court enter an order imposing the automatic stay under §362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2), or a motion for relief is granted under § 362(d).

Respectfully submitted,  
Repine K Repine

Dated: March 24, 2022

By: /s/ Michael T. Malarick, Esq  
Michael T. Malarick, Esq  
Attorney for Debtor(s)